



SUPPORT FOR UE 399 & UM 2114 Motion & APPROVAL OF UM 2114 Amended Proposed Budget

Benefit Corporations for Good is a company dedicated to supporting purpose driven small businesses. We certify businesses that have been incorporated as Oregon Benefit Companies . Currently we have certified over 74 small businesses from 24 cities throughout the state of Oregon.

These include professional services, retail, small high tech companies, BIPOC businesses and manufacturing. We serve as an advocate for their issues and needs as they practice the principles and values of Benefit Companies.

As we testified in 2022, we strongly support the diligent work of SBUA as it positively affects the operations of our businesses.

Currently, we are in full support for SBUA recovering intervenor funding for the significant work SBUA did for UE 399 and UM 2114 dockets. Both dockets included significant meeting time, data collection and review, SBUA staff including SBUA expert analysis, preparing public comments and testimony (testimony in the rate case), negotiation, and the list goes on.

The Commission has determined in both of these dockets that SBUA did represent small customer interests and that the organization did satisfy criteria for intervenor funding generally.

In regard to UE 399, SBUA fully satisfied the Commission's request re payment by SBUA of 20% toward the UE 399 amended budget of \$27,650 in December '22 w/ a small correction of about \$50 and \$200) in March'23. The Commission determined in May'23 to grant SBUA's amended budget in UE 399—the PacifiCorp rate case, but noted that there was only \$7,311.09 remaining in the 2022 PacifiCorp funds. That is completely insufficient to pay costs incurred for experts in the rate case, let alone other staff time.

In regard to UM 2114, SBUA has done basically what it can do to ensure fair allocation of the approximately \$70,000,000 (70 million dollars) of the COVID-19 program costs included in the COVID-19 Stipulation. The organization did succeed in suggesting a fairer allocation of COVID-19 costs and away from OPUC Staff's original rationale in the NW Natural rate case to allocate costs in a manner diverging from traditional principles underlying fair and reasonable cost allocation. Also, SBUA obtained more protections for small commercial customers in the new rules re disconnections and notices.

And regarding UM 2114, SBUA is in process of satisfying the payment by SBUA of 20% of the UM 2114 proposed amended budget of \$21,712 for the SBUA issue fund request of \$15,800.

It is fair and reasonable to grant SBUA's UE 399 & UM 2114 Motion to Reallocate Issue Funds and to approve SBUA's UM 2114 Amended Proposed Budget.

Respectfully,

*Tom Hering,
Co-founder & Managing Partner,
Benefit Corporations for Good
503-781-5989
tom@benefitcorporationsforgood.com*